

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on June 14, 2024

**MJ 24-03683**

UNITED STATES OF AMERICA

v.

ANDREW HENRRY RODRIGUEZ,  
SANTOS BALMORE MARTINEZ,  
**JOSE ANTHONY CONTRERAS,**  
ZACHARIACH JOEL MCNICHOLS,  
MARIA CAMILA ALVAREZ

Defendants.

CRIMINAL NO. 24-80 (APM)

GRAND JURY ORIGINAL

**VIOLATIONS:**

21 U.S.C. §§ 846, 841(a)(1) and  
841(b)(1)(A)(vi)  
(Conspiracy to Distribute and Possess  
with Intent to Distribute Four Hundred  
Grams or More of a Mixture and  
Substance Containing a Detectable  
Amount of Fentanyl)  
21 U.S.C. § 841(a)(1) and § 841(b)(1)(C)  
(Unlawful Distribution of Fentanyl)  
21 U.S.C. § 841(a)(1)  
and § 841(b)(1)(B)(vi)  
(Unlawful Distribution of Forty Grams or  
More of Fentanyl)

**FORFEITURE:**

21 U.S.C. § 853(a) and (p)

**INDICTMENT**

The Grand Jury charges that:

Case: 1:24-cr-00080

Assigned to: Judge Mehta, Amit P.

Assign Date: 6/18/2024

Description: SUPERSEDING INDICTMENT (B)

Related Case No: 24-cr-80 (APM)

**COUNT ONE**

From on or about April of 2023, and continuing until February 15, 2024, within the District of Columbia and elsewhere, **ANDREW HENRRY RODRIGUEZ, SANTOS BALMORE MARTINEZ, JOSE ANTHONY CONTRERAS, ZACHARIACH JOEL MCNICHOLS, and MARIA CAMILA ALAVAREZ**, did knowingly and willfully combine, conspire, confederate and agree together and with other persons both known and unknown to the

Shedelle  
Dorsett

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Shedelle Dorsett  
Date: 2024.06.18  
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**ECF DOCUMENT**

I hereby attest and certify that this is  
a printed copy of a document which  
was electronically filed with the  
United States District and Bankruptcy  
Courts for the District of Columbia.

ANGELA D. CAESAR, CLERK

Grand Jury, to unlawfully, knowingly and intentionally distribute and possess with intent to distribute four hundred grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi).

**(Conspiracy to Distribute and Possess with Intent to Distribute Four Hundred Grams or More of a Mixture and Substance Containing a Detectable Amount of Fentanyl, in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A)(vi), and 841(b)(1)(C))**

**COUNT TWO**

On or about August 14, 2023, within the District of Columbia, **ANDREW HENRRY RODRIGUEZ**, did unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic drug controlled substance.

**(Unlawful Distribution of Fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))**

**COUNT THREE**

On or about October 9, 2023, within the District of Columbia, **ANDREW HENRRY RODRIGUEZ**, did unlawfully, knowingly, and intentionally distribute forty grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic drug controlled substance.

**(Unlawful Distribution of Forty Grams or More of Fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi))**

**COUNT FOUR**

On or about January 18, 2024, within the District of Columbia, **ANDREW HENRRY RODRIGUEZ**, did unlawfully, knowingly, and intentionally distribute forty grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic drug controlled substance.

**(Unlawful Distribution of Forty Grams or More of Fentanyl**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi))

**COUNT FIVE**

On or about January 29, 2024, within the District of Columbia, **ANDREW HENRRY RODRIGUEZ**, did unlawfully, knowingly, and intentionally distribute forty grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic drug controlled substance.

**(Unlawful Distribution of Forty Grams or More of Fentanyl**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vi))

**FORFEITURE ALLEGATION**

1. Upon conviction of the offenses alleged in Counts One through Five of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly as the result of these offenses; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of this offense. The United States will also seek forfeiture money judgment against the defendants equal to the value of any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of these offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of these offenses.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property that cannot be divided without difficulty;

the defendants shall forfeit to the United States any other property of the defendants, up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p).

**(Criminal Forfeiture, pursuant to Title 21, United States Code, Sections 853(a) and (p))**

A TRUE BILL:

FOREPERSON.

*Matthew M. Stone / DTH*

Attorney of the United States in  
and for the District of Columbia.